

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

MILLENNIUM FUNDING, INC., A Nevada corporation, et al., PLAINTIFFS V. 1701 MANAGEMENT LLC d/b/a/ LIQUIDVPN, a Puerto Rico limited liability company, et al., DEFENDANTS	Civil Case No. 22-MC-00413 (PAD)
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APPLICATION AND ORDER FOR ADMISSION *PRO HAC VICE*

TO THE HONORABLE COURT:

COMES NOW, Kerry S. Culpepper, applicant herein, and pursuant to L. Cv. R. 83.1(f) of the United States District Court for the District of Puerto Rico, states as follows:

1. Applicant is an attorney at Culpepper IP, LLC; with offices at: 75-170 Hualalai Road, Suite B204, Kailua-Kona, Hawaii 96740; telephone number (808) 464-4047, fax (202) 204-5181 and electronic mail: kculpepper@culpepperip.com.
2. Applicant will sign all pleadings with the name “Kerry S. Culpepper”.
3. Applicant has been retained by the following to provide legal representation in connection with the above-styled matter pending before the United States District Court for the District of Puerto Rico:

MILLENNIUM FUNDING, INC., a Nevada corporation,

VOLTAGE HOLDINGS, LLC, a Nevada limited liability company,

BODYGUARD PRODUCTIONS, INC., a Nevada corporation,

KILLING LINK DISTRIBUTION, LLC, a California limited liability company,

LHF PRODUCTIONS, INC., a Nevada corporation,
RAMBO V PRODUCTIONS, INC., a Nevada corporation,
WONDER ONE, LLC, a Wyoming limited liability company
DEFINITION DELAWARE, LLC, a Delaware limited liability company,
MILLENNIUM IP, INC., a Nevada corporation,
NIKOLA PRODUCTIONS, INC., a Nevada corporation,
OUTPOST PRODUCTIONS, INC., a Nevada corporation,
GLACIER FILMS I, LLC, a Louisiana limited liability company,
VENICE PI, LLC, a California limited liability company,
I AM WRATH PRODUCTIONS, INC., a California corporation,
BADHOUSE STUDIOS, LLC, a Wyoming limited liability company,
YAR PRODUCTIONS, INC., a New York corporation,
AMBI DISTRIBUTION CORP., a Delaware corporation,
AFTER PRODUCTIONS, LLC, a Delaware limited liability company,
AFTER II MOVIE, LLC, a Nevada limited liability company,
MORGAN CREEK PRODUCTIONS, INC., a Delaware corporation,
BEDEVILED LLC, a California limited liability company,
MILLENNIUM MEDIA, INC., a Nevada corporation,
COLOSSAL MOVIE PRODUCTIONS, LLC, a California limited liability company,
FSMQ FILM, LLC, a California limited liability company,
FW PRODUCTIONS, LLC, a California limited liability company,
LF2 PRODUCTIONS, INC., a Nevada corporation,
RUPTURE CAL, INC., a California limited liability company,

MON, LLC, a California limited liability company,

SF FILM, LLC, a New York limited liability company,

SPEED KILLS PRODUCTIONS, INC., a Wyoming corporation,

HANNIBAL CLASSICS INC., a California corporation,

JUSTICE EVERYWHERE PRODUCTIONS LLC, a Georgia limited liability company,

STATE OF THE UNION DISTRIBUTION AND COLLECTIONS, LLC, a California limited liability company,

PARADOX STUDIOS, LLC, a Delaware limited liability company,

DALLAS BUYERS CLUB, LLC, a Texas limited liability company,

SCREEN MEDIA VENTURES, LLC, a Delaware limited liability company, and

42 VENTURES, LLC, a Hawaii limited liability company

4. Since November 5, 2012, applicant has been and presently is a member in good standing of the bar of the State of Hawaii where applicant regularly practices. Bar License number 9837.
5. Applicant is also admitted to practice and is a member in good standing of the bar of the following courts:

Name of State or Federal Bar or Court	Bar Number (if any)	Date Admitted	Status with Bar or Court* (active, inactive, retired, etc.)
Virginia Supreme Court	45292	10/30/2000	Active
District of Columbia Court of Appeals	474612	10/12/2001	Inactive
Hawaii Supreme Court	9837	11/13/2012	Active

Hawaii District Court		11/13/2021	Active
Court of Appeals, Ninth Circuit		10/27/2020	Active
Colorado District Court		7/10/2020	Active
Virginia Eastern District Court		4/6/2021	Active
Michigan Eastern District Court		2/10/2021	Active
Texas Western District Court		9/21/2020	Active
Maryland District Court		10/22/2021	Active
Court of Appeals, Fourth Circuit		5/21/2001	Active
Court of Appeals, Eleventh Circuit		12/22/2021	Active
New Mexico District Court		5/4/2022	Active

6. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

7. Likewise, as far as applicant knows, applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal proceeding before any court or jurisdiction.
8. During the past three years, applicant has not filed for *pro hac vice* admission in the United States District Court for the District of Puerto Rico in any matters:
9. Local counsel of record associated with applicant in this matter is:

C. CONDE & ASSOC.
San Jose Street #254, 5th Floor
San Juan, PR 00901-1253
Tel: (787) 729-2900
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Email: condecarmen@condelaw.com
S/Carmen D. Conde Torres
Carmen D. Conde Torres, Esq.
USDC No.: 207312
S/Luisa S. Valle Castro
Luisa S. Valle Castro, Esq.
USDC No.: 215611

10. Applicant has read the Local Rules of this court and will comply with same.
11. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Accordingly, payment of the *pro hac vice* admission fee is attached hereto in the form of a check or money order payable to: "Clerk, U.S. District Court."

WHEREFORE, applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled cases only.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 12th day of July, 2022.

By: /S/ Kerry S. Culpepper
Kerry S. Culpepper, Esq.
CULPEPPER IP, LLC
75-170 Hualalai Road
Suite B204
Kailua-Kona, Hawaii 96740
kculpepper@culpepperip.com
Counsel for Plaintiffs

WE HEREBY CERTIFY, pursuant to L. Civ. R. 83.1(f), that we consent to the designation of local counsel of record for all purposes.

WE HEREBY CERTIFY that on this same date the foregoing motion was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record and the original upon the Clerk of Court accompanied by a \$300.00 *pro hac vice* admission fee.

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ORDER

The Court, having considered the above Application for Admission *Pro Hac Vice*, orders that:

- ☐ the application be granted. The Clerk of Court shall deposit the admission fee to the account of Non-Appropriated Funds of this Court.
- ☐ the application be denied. The Clerk of Court shall return the admission fee to the applicant.

SO ORDERED.

In San Juan, Puerto Rico, this _____ day of June, 2022.

United States District Judge